

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE HUDSON'S BAY COMPANY DATA  
SECURITY INCIDENT CONSUMER  
LITIGATION

Case No. 1:18-cv-08472 (PKC)

**PLAINTIFFS' UNOPPOSED MOTION FOR FINAL  
APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs in the above-captioned action ("Plaintiffs"), by and through their attorneys, respectfully move this Court for an Order granting final approval of the proposed class action settlement ("Settlement"). In support of this unopposed motion, Plaintiffs rely on the attached Memorandum of Law, the Joint Declaration and its supporting exhibits, all documents filed therewith, and the arguments of counsel. Based on the foregoing, Plaintiffs ask that the Court enter the proposed Final Judgment, thereby

1. Granting Final Approval of the Settlement;
  2. Finally certifying the Settlement Class, appointing Timothy J. Peter of Faruqi & Faruqi, LLP and Janine L. Pollack of Calcaterra Pollack LLP as Class Counsel;
  3. Approving a service award of \$1,000 for each of the Plaintiffs (totaling \$15,000);
- and
4. Approving Class Counsel's request for attorneys' fees, costs, and expenses in the amount of \$1,400,000.

Dated: October 29, 2021

Respectfully Submitted,

/s/ Janine L. Pollack

Janine L. Pollack

**CALCATERRA POLLACK LLP**

1140 Avenue of the Americas, 9th Floor

New York, NY 10036-5803

Tel: (212) 899-1761

Fax: (332) 206-2073  
jpollack@calcaterrapollack.com

/s/ Timothy J. Peter

Timothy J. Peter

**FARUQI & FARUQI, LLP**

1617 JFK Boulevard, Ste. 1550

Philadelphia, PA 19103

Tel: (215) 277-5770

Fax: (215) 277-5771

tpeter@faruqilaw.com

*Interim Co-Lead Counsel for  
Plaintiffs and the Class*

**CERTIFICATE OF ELECTRONIC SIGNATURE CONSENT**

Pursuant to S.D.N.Y. Electronic Case Filing Rules & Instructions Section 8.5(b), I, Timothy J. Peter, represent that Janine L. Pollack consented to her electronic signature being used in this document.

/s/ Timothy J. Peter  
Timothy J. Peter (admitted *pro hac vice*)